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14 Attorneys for Defendant
15 FIRST OPTION MORTGAGE

16
17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA, SOUTHERN DIVISION
19

20 GODSON ERUCHALU,

21 Plaintiff,

22 v.

23 U.S. BANK, NATIONAL ASSOCIATION;
US BANK HOME MORTGAGE; US BANK
24 HOME MORT OUTSOURCING;
NATIONAL DEFAULT SERVICING CORP;
25 TIFFANY & BOSCO PA; FIRST OPTION
MORTGAGE; MERS; and DOES 1
26 THROUGH 100, INCLUSIVE,

27 Defendants.
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CASE NO. 2:12-CV-01264-RFB-VCF

**MOTION FOR WITHDRAWAL OF
GREG W. CHAMBERS, ESQ. ONLY AS
COUNSEL OF RECORD**

1 American Mortgage Law Group, P.C., which has appeared in these proceedings as a law firm
2 of record for defendant First Option Mortgage, respectfully moves this Court for an Order permitting
3 the withdrawal of one of its attorneys, Greg W. Chambers, as an attorney for defendant First Option
4 Mortgage in the above-captioned matter, pursuant to Local Rule 1A 10-6, S.C.R. 46, and N.R.P.C.
5 1.16(b)(1) and (7).

6 This motion is made and based upon the Memorandum of Points and Authorities submitted
7 herein, the Declaration of Greg W. Chambers attached hereto, the pleadings and papers on file herein,
8 and any argument adduced at the hearing of this motion to withdraw as counsel of record.

9 DATED this 5th day of March, 2015

10 McCORMICK, BARSTOW, SHEPPARD,
11 WAYTE & CARRUTH LLP

12
13 By /s/ Dylan P. Todd

14 Wade M. Hansard
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Attorneys for Defendant
FIRST OPTION MORTGAGE

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MEMORANDUM OF POINTS AND AUTHORITIES

Attorney Greg W. Chambers will no longer be employed by American Mortgage Law Group, P.C. effective February 9, 2015. Furthermore, it is the firm American Mortgage Law Group, P.C. that was retained by defendant First Option Mortgage to represent it in the above-caption action, with Greg W. Chambers serving as one of two attorneys with the firm overseeing representation. Local Rule 1A 10-6 (a) provides that “No attorney may withdraw after appearing in a case except by leave of court after notice served on the affected client and opposing counsel.” Defendant First Option Mortgage has been advised of Greg W. Chambers’ intent to withdraw from this case due to his pending departure from the firm. Additionally, plaintiff Godson Eruchalu (in pro per) will receive notice of this motion to withdraw via the CM/ECF system and/or service by mail, as will the co-defendants, pursuant to the Certificate of Service attached.

Local Rule 1A 10-6(e) provides that “no withdrawal...shall be approved if delay of discovery, the trial or any hearing in the case would result.” Here, no delay of any kind will result from Greg W. Chambers’ withdrawal because defendant First Option Mortgage will continue to be represented in this matter by American Mortgage Law Group, P.C., and James W. Brody, *pro hac vice*, will continue to oversee the litigation. Additionally, attorney Andrew Steinfeld of the firm will soon be submitting a petition to be admitted in this action *pro hac vice*. Local counsel McCormick, Barstow, Sheppard, Wayte & Carruth will also continue to represent defendant First Option Mortgage in this action. Greg W. Chambers’ withdrawal will not prejudice any party or delay any proceeding in this matter.

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CONCLUSION

For the reasons set forth above, American Mortgage Law Group, P.C. respectfully moves this Court to enter an Order approving the withdrawal of Greg W. Chambers as a representing attorney for defendant First Option Mortgage in this action.

DATED this 5th day of March, 2015

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By /s/ Dylan P. Todd

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Attorneys for Defendant
FIRST OPTION MORTGAGE

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: March 13, 2015

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2015, a true and correct copy of **MOTION FOR WITHDRAWAL OF GREG W. CHAMBERS, ESQ. ONLY AS COUNSEL OF RECORD** and **DECLARATION OF GREG W. CHAMBERS, ESQ. IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL OF RECORD** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

I further hereby certify that on this 5th day of March, 2015, a true and correct copy of **MOTION FOR WITHDRAWAL OF GREG W. CHAMBERS, ESQ. ONLY AS COUNSEL OF RECORD** and **DECLARATION OF GREG W. CHAMBERS, ESQ. IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL OF RECORD** was placed in an envelope, postage prepaid, addressed as stated below, in the basket for outgoing mail before 4:00 p.m. at MCCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP. The firm has established procedures so that all mail placed in the basket before 4:00 p.m. is taken that same day by an employee and deposited in a U.S. Mail box.

Godson Eruchalu
7730 North Jones Boulevard
Las Vegas, NV 89131
Pro Se Plaintiff

By /s/ Stacy Warner
Stacy Warner, an Employee of
MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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